

# COMPLAINT

(for non-prisoner filers without lawyers)

U.S. DISTRICT COURT  
EASTERN DISTRICT - WI  
FILED

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

706 APR 18 P 3:02

JON W. SANFILIPPO  
CLERK

(Full name of plaintiff(s))

Michelle Lundy

1310 Navajo Ln Apt 208

Waukesha, WI 53186

v.

Case Number:

16-C-0470

(to be supplied by Clerk of Court)

(Full name of defendant(s))

Westwood Height Apt/ Jack Sheehan

1705 Elder St Apt 101, Waukesha, WI 53186

St. Clare Management

3069 N. 59th St, Milwaukee, WI 53210

## A. PARTIES

1. Plaintiff is a citizen of Wisconsin and resides at  
(State)

1310 Navajo Ln Apt 208  
(Address)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant St. Clare Management (Name)

is (if a person or private corporation) a citizen of Wisconsin

and (if a person) resides at 3069 N. 59th St

(State, if known)

and (if the defendant harmed you while doing the defendant's job)

(Address, if known)

worked for Westwood Height Inc / Jack Sheehan 1705 Elter St Apt 101

(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

**B. STATEMENT OF CLAIM**

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

Who violated (St. Clare Management / Westwood Heights Apartments)  
On June 7 2014 my family (daughter JN [REDACTED] age 16 and Son Malik  
age 18) and I was treated different from other tenants, I  
received a letter regarding Recertification for my low income housing.  
In this letter it stated that St. Clare Management / Westwood Heights  
Apartments needed my son Malik income information, because he  
was a working 18 year old. I was not aware that I should  
had to report his income due to him being a college student.  
Since being notified I have cooperated with HUD by reporting  
all changes and both income. As of September 13, 2014, I no  
longer work due to illness, but I did receive a monthly

child support check. However, St. Clare Management/Westwood Heights Apartments have tenants living in the Westwood Heights Apartments have tenants living in the Westwood Height Apartment Complex that are freely not being required to follow the same HUD guideline and rules as my family when pertaining to reporting all household income. I am aware of two tenants living in the Westwood Height Apartments not paying what is required on rent. On August 31, 2013, after moving in I notice the shower head needed to be replace. It was old with built up residue. I was told by (Dan) I could not change it out, it was just built up lime. That same day Dan (the property manager), also told me I could not hang pictures on the wall. On September 4, 2013 I notice other tenants in the complex with pictures on the wall. On October 23, 2014, I filed a complaint with HUD and EEOC for discrimination. My family and I On February 18, 2016, my family and I was wrongfully evicted from 1705 Elder St apt 103, located in Waukesha, WI, due to me filing a complaint with HUD and EEOC.

### C. JURISDICTION

I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ \_\_\_\_\_.

**D. RELIEF WANTED**

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I, Michelle Hardy am asking the court  
to help me remedy this matter

E. JURY DEMAND

I want a jury to hear my case.

- YES       - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 18 day of April 2016.

Respectfully Submitted,



Signature of Plaintiff

262-309-8578

Plaintiff's Telephone Number

i1uvmymkm3@gmail.com

Plaintiff's Email Address

1310 Navajo Ln Apt 208

Waukesha, WI 53186

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE  
FILING FEE**

I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Filing Fee form and have attached it to the complaint.

I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.